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*Attorneys for Proposed Amicus Curiae, Digital Progress Institute*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA  
MISSOULA DIVISION**

SAMANTHA ALARIO, et al.,

Plaintiff,

TIKTOK INC.,

Consolidated Plaintiff;

vs.

AUSTIN KNUDSEN, in his official  
capacity as Attorney General of the State  
of Montana,

Defendant.

Lead Case No.  
CV 23-56-M-DWM

Member Case No.  
CV 23-61-M-DWM

**MOTION FOR *PRO HAC VICE*  
ADMISSION OF JOEL THAYER**

Pursuant to Local Rule 83.1(d), the undersigned counsel, Jack G. Connors, respectfully submits the following Motion for Admission *Pro Hac Vice* of Joel Thayer, Thayer, PLLC, 1255 Union Street, 7th Floor, Washington, DC 20002 on behalf of proposed *amicus curiae* Digital Progress Institute. If this Motion is granted, Mr. Thayer will serve as an attorney of record for Digital Progress

Institute, which will file an amicus brief in the above captioned litigation pursuant to Local Rule 7.5.

In support the application, the undersigned states:

1. Mr. Thayer is not admitted to practice in the United States District Court for the District of Montana, but he is an active member in good standing of the District of Columbia and the State of California bar associations.
2. Mr. Thayer is not currently suspended or disbarred by any court and has not ever been held in contempt or otherwise disciplined by any court for disobedience to its rules or orders, or sanctioned under Fed. R. Civ. P. 11 or 37(b), (c), (d), or (f), or their state equivalents.
3. Mr. Thayer has not concurrently or within the two years preceding the date of this application made any *pro hac vice* applications to this Court.
4. Movant, Jack G. Connors, Montana State Bar No. 13504, is a shareholder in the Doney Crowley P.C. law firm. Movant is a member in good standing of the Montana Bar and the United States District Court for the District of Montana, and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and counsel may readily communicate regarding the conduct of this case, upon whom filings shall be served, who shall participate actively in all phases of

this action and sign all required pleadings, motions and briefs, and who shall be in compliance with the CM/ECF Administrative Procedures.

5. In accordance with this Court's Local Rules, Mr. Thayer will make payment of this Court's \$262.00 admission fee simultaneously with the filing of this Motion. The declaration of Mr. Thayer required by Local Rule 83.1(d)(4) is filed herewith as Exhibit A. Pursuant to Local Rules 7.1(c)(3), a proposed order is filed herewith as Exhibit B, the Word version of which has been emailed to the court at [dwm\\_propord@mtd.uscourts.gov](mailto:dwm_propord@mtd.uscourts.gov).

DATED this 13th day of September, 2023.

DONEY CROWLEY P.C.

/s/ Jack G. Connors

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Jack G. Connors  
*Attorneys for Amicus Curiae,*  
*Digital Progress Institute*